

**CARLYON CICA CHTD.**

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*Nevada Counsel for Movant, Mark L. Bunce*

**MILLER & MARTIN PLLC**

PAUL ALEXANDER, ESQ.

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*Lead Counsel for Movant, Mark L. Bunce*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:

VISUAL TECHNOLOGY INNOVATIONS, INC.,

Debtor.

Case No.: 25-10024-abl  
Chapter 11

**NOTICE OF ENTRY OF ORDER  
APPROVING STIPULATION  
REGARDING RESERVATION OF  
OBJECTION WITH REGARD TO  
FIRST INTERIM FEE APPLICATION**

Hearing Date: June 17, 2025

Hearing Time: 1:30 p.m.

PLEASE TAKE NOTICE that on June 4, 2025, the United States Bankruptcy Court, District of Nevada entered an *Order Approving Stipulation Regarding Reservation of Objection with Regard to First Interim Fee Application* [ECF No. 98] (the “Order”).

1 A true and correct copy of the order is attached hereto as **Exhibit 1**.

2 Respectfully submitted this 4<sup>th</sup> day of June 2025

3  
4 **CARLYON CICA CHTD.**

5 By: /s/ Candace C. Carlyon  
6 CANDACE C. CARLYON, ESQ.

7 Nevada Bar No.2666

8 DAWN M. CICA, ESQ.

9 Nevada Bar No. 4565

10 TALI J. FREY, ESQ.

11 Nevada Bar No. 16537

12 265 E. Warm Springs Road, Suite 107

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**CERTIFICATE OF SERVICE**

I am an employee of Carlyon Cica Chtd. On the date of filing of the foregoing papers with the Clerk of Court I caused a true and correct copy to be served in the following manner:

☒ ELECTRONIC SERVICE: Pursuant to LR 2002 of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed and served on all parties and attorneys who are filing users through the Notice of Electronic Filing automatically generated by the Court.

☒ UNITED STATES MAIL and ELECTRONIC MAIL By depositing a true and correct copy of the above-referenced document into the United States Mail with prepaid first-class postage, and email to the addresses listed below:

☐ OVERNIGHT COURIER: By depositing a true and correct copy of the above-referenced document for overnight delivery via a nationally recognized courier, addressed to the parties listed below which was incorporated by reference and made final in the w at their last-known mailing address.

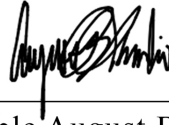
☐ FACSIMILE: By sending the above-referenced document via facsimile to those persons listed on the attached service list at the facsimile numbers set forth thereon.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Cristina Robertson  
An employee of Carlyon Cica Chtd.

# EXHIBIT “1”

# EXHIBIT “1”



Honorable August B. Landis  
United States Bankruptcy Judge



Entered on Docket  
June 04, 2025

**CARLYON CICA CHTD.**  
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*Lead Counsel for Movant, Mark L. Bunce*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:

VISUAL TECHNOLOGY INNOVATIONS, INC.,  
  
Debtor.

Case No.: 25-10024-abl  
Chapter 11

**ORDER APPROVING  
STIPULATION REGARDING  
RESERVATION OF OBJECTION**

**WITH REGARD TO FIRST  
INTERIM FEE APPLICATION**

Hearing Date: June 17, 2025

Hearing Time: 1:30 p.m.

The Court, having reviewed and considered the Stipulation Regarding Reservation of Objection with Regard to Fee Application entered into by Mark L. Bunce, a/k/a Mark Leonard Bunce (“Creditor”), a creditor in the above-captioned bankruptcy case, by and through his counsel, the law firm of Carlyon Cica, Chtd., and Visual Technology Innovations, Inc. (the “Debtor” and together with Mark L. Bunce, the “Parties”) and for good cause appearing:

**IT IS HEREBY ORDERED** that the Stipulation attached as Exhibit 1 is **APPROVED** in its entirety.

**IT IS HEREBY FURTHER ORDERED** that any objection by Mark L. Bunce to any filed interim fee application are deferred until the hearings on the final fee application.

Respectfully submitted, this 2<sup>nd</sup> day of June, 2025.

**MILLER & MARTIN PLLC**

**LARSON & ZIRZOW, LLC**

Paul M. Alexander, Esq.  
(Admitted pro hac vice)  
Georgia Bar No. 009003  
Michael P. Kohler, Esq.  
(Admitted pro hac vice)  
Georgia Bar No. 427727

By: /s/ Matthew Zirzow  
ZACHARIAH LARSON, ESQ., NBN 7787  
MATTHEW C. ZIRZOW, ESQ., NBN 7222  
850 E. Bonneville Ave.  
Las Vegas, Nevada 89101

*Lead Counsel for Movant, Mark L. Bunce      Attorneys for Debtor*

**AND**

**CARLYON CICA CHTD.**  
CANDACE C. CARLYON, ESQ.  
Nevada Bar No. 2666  
DAWN M. CIA, ESQ.  
Nevada Bar No. 4565

*Nevada Counsel for Movant, Mark L.  
Bunce*

/s/ Candace Carlyon

# EXHIBIT “1”

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*Nevada Counsel for Movant, Mark L. Bunce*

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*Lead Counsel for Movant, Mark L. Bunce*

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re:

VISUAL TECHNOLOGY INNOVATIONS, INC.,

Debtor.

Case No.: 25-10024-abl

Chapter 11

**STIPULATION REGARDING  
RESERVATION OF OBJECTION  
WITH REGARD TO FIRST  
INTERIM FEE APPLICATION**

Hearing Date: June 17, 2025

Hearing Time: 1:30 p.m.



1 Mark L. Bunce, a/k/a Mark Leonard Bunce (“Creditor”), a creditor in the above-captioned  
2 bankruptcy case, by and through his counsel, the law firm of Carlyon Cica, Chtd., and Visual  
3 Technology Innovations, Inc. (the “Debtor” and together with Mark L. Bunce, the “Parties”) hereby  
4 stipulate and agree as follows (the “Stipulation”):

5 WHEREAS, on May 15, 2025, Visual Technology Innovations, Inc filed the First Interim Fee  
6 Application Of Larson & Zirzow, LLC as Counsel to the Debtor for the Allowance of Compensation  
7 for Services Rendered and Reimbursement of Expenses Incurred [ECF No. 90] (the “LZ Interim Fee  
8 Application”);

9 WHEREAS, the deadline to file any objection to the LZ Interim Fee Application, (collectively  
10 the “LZ Interim Fee Application”) is June 3, 2025.

11 WHEREAS, the Parties wish to avoid unnecessary expense:

12 NOW, THEREFORE,

13 **IT IS HEREBY STIPULATED** that Mark L. Bunce may reserve any objections to any  
14 Interim Fee Application to be heard in connection with the final fee applications.

15 Respectfully submitted, this 30<sup>th</sup> day of April, 2025.

16 **MILLER & MARTIN PLLC**

17 Paul M. Alexander, Esq.  
18 (*Admitted pro hac vice*)  
Georgia Bar No. 009003  
19 Michael P. Kohler, Esq.  
20 (*Admitted pro hac vice*)  
Georgia Bar No. 427727  
*Lead Counsel for Movant, Mark L. Bunce*

21 AND

22 **CARLYON CICA CHTD.**  
23 CANDACE C. CARLYON, ESQ.  
Nevada Bar No. 2666  
24 DAWN M. CIA, ESQ.  
Nevada Bar No. 4565  
25 *Nevada Counsel for Movant, Mark L.*  
*Bunce*

26 /s/Candace Carlyon  
27  
28

**LARSON & ZIRZOW, LLC**

By: /s/ Matthew Zirzow  
ZACHARIAH LARSON, ESQ., NBN 7787  
MATTHEW C. ZIRZOW, ESQ., NBN 7222  
850 E. Bonneville Ave.  
Las Vegas, Nevada 89101

Attorneys for Debtor

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of Carlyon Cica Chtd. and that, on the 30<sup>th</sup> day of April 2025, I caused to be served a true and correct copy of **STIPULATION REGARDING RESERVATION OF OBJECTION WITH REGARD TO FIRST INTERIM FEE APPLICATION** in the following manner.

☒ (ELECTRONIC SERVICE) Under Local Rule 5005 of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

☐ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date written above.

☐ (OVERNIGHT COURIER) By depositing a true and correct copy of the above-referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date written above.

☐ (FACSIMILE) By serving a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those listed on the attached service list, and on the date written above.

/s/ Cristina Robertson  
An employee of Carlyon Cica Chtd.